

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION

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|---------------------------------------|---|-------------------------------|
| NEFERTITI GILBERT, <i>et al.</i> , | * | CIVIL ACTION NO.: |
| Plaintiffs, | * | 1:25-cv-00421 |
| | * | |
| VERSUS | * | JUDGE DRELL |
| | * | |
| HARRIS COUNTY, TEXAS, <i>et al.</i> , | * | MAGISTRATE JUDGE PEREZ-MONTES |
| Defendants. | * | |
| ***** | * | JURY TRIAL REQUESTED |

CONSENT MOTION FOR EXTENSION OF TIME
TO FILE RESPONSIVE PLEADINGS

NOW INTO COURT, through undersigned counsel, come Defendants, LaSalle Correctional Center, L.L.C., LaSalle Corrections, L.L.C., LaSalle Management Company, L.L.C., Clay McConnell, William McConnell, John Stuckey, Paul Smith, Richard Morehead, Mariah Dickey, Pamela Hearn, M.D., Charlotte Fussell, Shannon Brewer, Gwen Warren, and Denise Finlay (collectively “LaSalle Defendants”), who respectfully move the Court to issue an order granting Defendants an extension of time, through and including July 21, 2025, to respond to the Complaint [Doc. 1] filed by Plaintiffs, Nefertiti Gilbert, as Personal Representative of Jaleen Anderson, deceased, and on her own behalf, and on behalf of her minor child A.G.; Christi Jackson, on behalf of her minor children X.A. and J.A.; and Jyrie Polk, on behalf of her minor child A.A. (collectively “Plaintiffs”). In support of their Consent Motion for Extension of Time to File Responsive Pleadings, LaSalle Defendants respectfully submit as follows:

1.

Plaintiffs filed the Complaint on April 2, 2025. *See* [Doc. 1].

2.

Defendants, John Stuckey, Paul Smith, Richard Morehead, Mariah Dickey, Charlotte Fussell, Shannon Brewer, and Gwen Warren were served with the Complaint on May 8, 2025, and

their current deadline to file responsive pleadings is May 29, 2025. *See* Fed. R. Civ. P. 12(a)(1)(A)(i).

3.

Defendants, LaSalle Correctional Center, L.L.C., LaSalle Corrections, L.L.C., LaSalle Management Company, L.L.C., Clay McConnell, William McConnell, and Pamela Hearn, M.D. were served with the Complaint on May 13, 2025, and their current deadline to file responsive pleadings is June 3, 2025. *See* Fed. R. Civ. P. 12(a)(1)(A)(i).

4.

Defendant, Denise Finlay has agreed to waive service of the Complaint pursuant to Fed. R. Civ. P. 4(d).

5.

Pursuant to Fed. R. Civ. P. 6(b), the Court may extend the time for LaSalle Defendants to respond to Plaintiffs' Complaint for good cause.

6.

LaSalle Defendants' counsel require additional time to investigate the allegations and factual circumstances of this lawsuit, review file materials, and prepare pleadings responsive to Plaintiffs' Complaint on behalf of fourteen (14) of the named defendants in this lawsuit. Thus, LaSalle Defendants contend good cause exists for this Court to grant LaSalle Defendants an extension of time to respond to Plaintiffs' Complaint.

7.

LaSalle Defendants, therefore, respectfully request that they be granted an extension of time, through and including July 21, 2025, to file pleadings in response to Plaintiffs' Complaint.

8.

This is LaSalle Defendants' first request for an extension of time to file responsive pleadings, and this matter has not yet been set for trial. Accordingly, the requested extension will not prejudice any party or unduly delay this matter.

9.

Pursuant to LR 7.9, LaSalle Defendants certify that Plaintiffs do not oppose the requested extension of the time for LaSalle Defendants to file responsive pleadings.

WHEREFORE, Defendants, LaSalle Correctional Center, L.L.C., LaSalle Corrections, L.L.C., LaSalle Management Company, L.L.C., Clay McConnell, William McConnell, John Stuckey, Paul Smith, Richard Morehead, Mariah Dickey, Pamela Hearn, Charlotte Fussell, Shannon Brewer, Gwen Warren, and Denise Finlay respectfully request that this Court grant their "Consent Motion for Extension of Time to File Responsive Pleadings," and issue an Order extending LaSalle Defendants' time to respond to Plaintiffs' Complaint, through and including July 21, 2025.

[signature on next page]

Respectfully submitted,

/s/ Deirdre C. McGlinchey

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RICHARD MOREHEAD, MARIAH DICKEY,
PAMELA HEARN, CHARLOTTE FUSSELL,
SHANNON BREWER, GWEN WARREN, and
DENISE FINLAY

CERTIFICATE OF SERVICE

I certify that on May 23, 2025, a copy of this pleading was filed electronically with the Clerk of Court using the CM/ECF system which will send notification to all counsel of record.

/s/ Deirdre C. McGlinchey

DEIRDRE C. McGLINCHEY

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| VERSUS | * | JUDGE DRELL |
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| HARRIS COUNTY, TEXAS, <i>et al.</i> , | * | MAGISTRATE JUDGE PEREZ-MONTES |
| Defendants. | * | |
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ORDER

CONSIDERING THE FOREGOING “Consent Motion For Extension of Time to File Responsive Pleadings” filed on behalf of Defendants, LaSalle Correctional Center, L.L.C., LaSalle Corrections, L.L.C., LaSalle Management Company, L.L.C., Clay McConnell, William McConnell, John Stuckey, Paul Smith, Richard Morehead, Mariah Dickey, Pamela Hearn, M.D., Charlotte Fussell, Shannon Brewer, Gwen Warren, and Denise Finlay,

IT IS HEREBY ORDERED that the motion be and is granted. The deadline is extended, through and including July 21, 2025, for Defendants, LaSalle Correctional Center, L.L.C., LaSalle Corrections, L.L.C., LaSalle Management Company, L.L.C., Clay McConnell, William McConnell, John Stuckey, Paul Smith, Richard Morehead, Mariah Dickey, Pamela Hearn, Charlotte Fussell, Shannon Brewer, Gwen Warren, and Denise Finlay to respond to Plaintiffs’ Complaint [Doc. 1].

Alexandria, Louisiana, this ____ day of May, 2025.

JOSEPH H. L. PEREZ-MONTES
Magistrate Judge